UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE:

APPLICATION OF HORNBEAM CORP.

14 Misc. 424 (VSB)

NOTICE OF MOTION FOR RELEIF FROM AN ORDER PURSUANT TO FED. R. CIV. P. 60(b)(2)

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated October 15, 2015, the Declaration of Bruce S. Marks, dated October 15, 2015, the Third Declaration of Robert Nader dated October 15, 2015 and upon all of the pleadings and proceeding heretofore had herein, Panikos Symeou, by and through his undersigned counsel, will hereby move this Court on a date and time as may be designated by the Court, at 500 Pearl Street, New York, NY, pursuant to Fed. R. Civ. P. 60(b)(2), for relief from this Court's Order, entered September 17, 2015, which granted in part and denied in part Symeou's Motion to Vacate this Court's prior order, dated December 24, 2014, granting Hornbeam Corp.'s ex parte application pursuant to 28 U.S.C. § 1782.

Dated: October 15, 2015

New York, New York

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By: /s/ Steven Cooper

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